

Lewis, Jonathan v. Circle K Stores, Inc., et al.

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UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

JOHNATHAN LEWIS,

Plaintiff,

vs. CASE NO. 4:23-cv-01720-JD

CIRCLE K STORES, INC.,

Defendant.

VIDEOCONFERENCE

DEPOSITION OF: JOSEPH J. CALANDRA, MD

(Attending by VTC)

DATE: July 16, 2024

TIME: 10:04 a.m.

LOCATION: Law Offices of
Regus - Mount Pleasant
1240 Winnowing Way
Suite 102
Mount Pleasant, South Carolina

TAKEN BY: Counsel for the Plaintiff

REPORTED BY: JULIE L. BONOMO

(Attending by VTC)

1 of the next opinion in your report, you say, it is
2 possible that the patellar tendon ruptured first
3 and this is what caused him to fall. Do you still
4 hold that opinion today?

5 A. Yes according to his original history,
6 that's possible and -- yeah.

7 Q. Okay. The next opinion in your report
8 at least is that it is likely that he did not -- he
9 being Mr. Lewis, did not have a normal patellar
10 tendon insertion, and I believe this contributed to
11 his injury. Do you still hold that opinion?

12 A. Yes. When I say insertion, his distal
13 -- his whole patellar tendon is not normal. Okay,
14 yeah. So right. Yes.

15 Q. I will ask you some questions in a
16 moment about the anatomy of the patellar tendon.

17 A. Okay.

18 Q. So, you know, pop quiz, be ready. You
19 said, the usual mechanism for a rupture of a
20 healthy patellar tendon is a forced extension of
21 the knee against a fixed flexion of the knee. And
22 you give an example of falling down the stairs
23 while trying to straighten the knee. Is that an
24 opinion that you hold in this case that that is the
25 usual mechanism of injury to patellar tendon?

1 A. For a normal patellar tendon rupture,
2 forced extension against a fixed flexion.

3 Q. I apologize. I'm just making some
4 notes here.

5 A. I guess another one would be you see it
6 in basketball player, young basketball players
7 where they -- sudden acceleration or sudden jump
8 would also do it.

9 Q. What do you mean by a sudden
10 acceleration or sudden jump?

11 A. A sprint, they go from standing still
12 to a sprint and in the adolescents, often
13 they'll -- the patellar tendon itself won't
14 rupture, but they'll tear a piece of bone at the
15 insertion site will come off.

16 Q. Okay. All right. So as I'm keeping
17 track here, I want to make sure that I'm
18 summarizing this accurately and not putting words
19 in your mouth. We have your opinion about the
20 preexisting conditions, we have your opinion about
21 the patellar tendon possibly rupturing first, we
22 have your opinion that the -- that Mr. Lewis likely
23 did not have a normal patellar tendon insertion,
24 and we have your opinion about the usual mechanism
25 of rupture for a healthy patellar tendon.